

**MEMO ENDORSED**

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
52 Duane Street-10th Floor, New York, NY 10007  
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton  
*Executive Director*

*Southern District of New York*  
Jennifer L. Brown  
*Attorney-in-Charge*

June 23, 2021

**BY ECF**

Honorable Valerie E. Caproni  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**Re: United States v. Hugo Mendoza  
21 Cr. 273 (VEC)**

Honorable Judge Caproni,

I write, as counsel to Hugo Mendoza in the above-captioned matter, to respectfully request that the Court modify Mr. Mendoza's pretrial conditions of release to replace Mr. Mendoza's condition of home detention with a curfew to be set by pretrial services. This request comes on the heels of an electrical fire that burned his entire family home in New York. Pretrial services and the Government consent to this request.

On January 28, 2021, Mr. Mendoza was presented in Magistrate Court. The following bail conditions were set and subsequently met:

\$50,000 personal recognizance bond to be co-signed by two financially responsible persons; pre-trial services supervision as directed; surrender of travel documents with no new applications and travel restricted to the Southern and Eastern Districts of New York; drug testing and treatment as directed by pretrial services; refrain from possession of controlled substances unless otherwise prescribed by a licensed physician; home detention with location monitoring; may only work at a job with a specified location and approved by pretrial services, consistent with home detention.

Since the start of this case, Mr. Mendoza has remained in consistent compliance with the conditions of his release.

On May 4, 2021, the Court granted Mr. Mendoza's first bail modification request to permit pretrial services discretion to set an exercise schedule for Mr. Mendoza to enable him to go outside for routine exercise for at least 1.5 hours a day, 3 times a week, as recommended by his doctor.

On the early morning hours of June 7, 2021, Mr. Mendoza escaped an electrical fire in his home that destroyed his family's entire house. Since then, Mr. Mendoza has remained in constant contact with pretrial services as he relocated to temporary housing in New York. Given the transient nature of Mr. Mendoza's current housing situation and his consistent compliance with pretrial release thus far, Mr. Mendoza now respectfully requests a bail modification to replace Mr. Mendoza's condition of home detention with a curfew to be set by pretrial services. Pretrial services and the Government consent to this request.

Thank you for your consideration of this request.

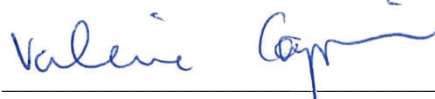
Respectfully submitted,

/s/

Marne Lenox  
Assistant Federal Defender  
(212) 417-8721

Application GRANTED.

**SO ORDERED:**



**HONORABLE VALERIE E. CAPRONI**

United States District Judge

Date: June 23, 2021

cc: Ni Qian, Assistant U.S. Attorney  
Ashley Cosme, Pretrial Services Officer